

### **REMARKS**

Claims 1-47 remain pending in the application.

#### **Claims 1-5 and 39-47 over Shultz in view of Takahashi and Hawkins**

In the Office Action, claims 1-5 and 39-47 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,453,339 to Shultz et al. ("Shultz") in view of U.S. Patent No. 6,442,589 to Takahashi et al. ("Takahashi"), and further in view of U.S. Patent No. 6,389,421 to Hawkins et al. ("Hawkins").

Claims 41-47 are dependent on claims 26 and 35-38, and are allowable for at least the same reasons as claims 26 and 35-38.

Claims 1-5, 39 and 40 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads. Claims 41-47 recite a system and method relying on at least one of an event listener and a data worker for user objects interposed between a source and a destination that are implemented as individual threads.

The Examiner acknowledges that Shultz in view of Takahashi fails to disclose all of the claimed features. The Examiner relies on Hawkins to make up for the deficiencies in Shultz in view of Takahashi to arrive at the claimed features. The Applicants respectfully disagree.

The Examiner alleges Hawkins discloses limiting one watermarking thread per processor at col. 4, lines 1-9 and lines 39-45 (See Office Action, page 5). Moreover, the Examiner alleges that Hawkins discloses an information retrieval system acting on behalf of a user request that implements requests in threads and executes each thread individually (See Office Action, page 5).

The Examiner appears to be correct in that Hawkins discloses a system and method wherein one watermarking thread is implemented per processor at col. 4, lines 1-9 and lines 39-45. However, Hawkins discloses watermark objects as individual threads (having nothing to do with a user) **NOT** user objects that are implemented as individual threads and at least one of an

event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 1-5 and 39-47.

Moreover, Hawkins discloses a watermarking process that is implemented on a server at col. 6, lines 44-59. Hawkins' server is a data source, **NOT** an individualized network information delivery system **interposed between at least one data source and a destination device** and at least one of an event listener and a data worker **interposed between a source and a destination** that are implemented as individual threads, as recited by claims 1-5 and 39-47.

Thus, modifying Shultz in view of Takahashi with the disclosure of Hawkins would at best result in a server processing watermarks, each watermark being processed as individual threads. Shultz in view of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads and at least one of an event listener and a data worker **interposed between a source and a destination** that are implemented as individual threads, as recited by claims 1-5 and 39-47.

The Examiner acknowledged that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed features where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art (See Office Action, page 35). The Examiner alleges that the Applicants failed to provide evidence to demonstrate the inappropriateness of the new combination (See Office Action, page 35). The Applicants respectfully disagree.

As discussed above, the Examiner has failed to provide prior art references that disclose all of the claimed features. Thus, combining the cited prior art does not disclose or suggest what the cited prior art fails to disclose or suggest individually. The Examiner is taking elements from the claimed features out of context from their relationship from other claimed elements.

For example, the Examiner cites Hawkins to disclose an information retrieval system acting on behalf of a user request that implements

requests in threads and executes each thread individually. The Examiner may be able to find numerous prior art references that disclose an information retrieval system acting on behalf of a user request that implements requests in threads and executes each thread individually, such is **NOT** what the Applicants are claiming. Thus, even if it were obvious to combine Hawkins with other cited prior art, the combination can not disclose or suggest what the cited prior art fails to disclose or suggest since a combination is made up of disclosed elements. The Examiner has still failed to provide a single prior art reference that discloses or suggests an element **interposed between a source and a destination** on a network that implements threads, much less an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads. Thus, arguing against the combination of the cited prior art when that cited prior art fails to disclose or suggest the claimed features is illogical. However, Applicants do discuss above what the theoretical combination would disclose or suggest (if they were obvious to combine, which they are not), that would still not arrive at the claimed features.

Accordingly, for at least all the above reasons, claims 1-5 and 39-47 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 10 and 14 over Schultz in view of Takahashi, Hawkins and IBM**

In the Office Action, claims 10 and 14 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, and further in view of A Process for Customized Information Delivery, IBM ("IBM"). The Applicants respectfully traverse the rejection.

Claims 10 and 14 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 10 and 14 recite an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as **individual threads**, as recited by claims 10 and 14.

IBM is relied on to disclose a home PC gathering material from the web and translating the material into an audio format for replay in a car (See Office Action, page 8). However, IBM fails to disclose anything related to an individualized network information delivery system and anything remotely related to selective retrieval of the information. All IBM discloses is an in-line translation of material for delivery to an end device, to meet the specific requirements or to trigger event restrictions of an end user. Thus, even if it were obvious (which it is not since the systems are completely unrelated) to modified Shultz in view of Takahashi and Hawkins, and further in view of IBM, IBM's invention being a generic text to speech conversion, the theoretical result would still fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as **individual threads**, as recited by claims 10 and 14.

Accordingly, for at least all the above reasons, claims 10 and 14 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 6-9, 19 and 21 over Schultz in view of Takahashi, Hawkins and Herz**

In the Office Action, claims 6-9, 19 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Schultz in view of Takahashi and Hawkins, and further in view of U.S. Patent No. 6,029,195 to Herz ("Herz"). The Applicants respectfully traverse the rejection.

Claims 6-9, 19 and 21 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 6-9, 19 and 21 recite an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as **individual threads**.

As discussed above, Shultz in view of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 6-9, 19 and 21.

Herz is relied on to disclose a query engine adapted to query a database for content (See Office Action, page 9). Depending on a user's interest levels for various topics, the system generates a user-customized rank ordered listing of target objects most likely to be of interest to each user (See Herz, col. 35, lines 56-64). Users' target profile interest summaries can be used to efficiently organize the distribution of information in a large scale system and network (See Herz, col. 34, lines 33-45). Herz directly interconnects clients and servers (See Figs. 1 and 2).

Thus, Herz discloses a system for and method of allowing a user to define criteria that is used to selectively retrieve content from a data source. However, Herz's system and method relies on a direct connection of clients and servers **NOT** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claims 6-9, 19 and 21.

Thus, even if it were obvious to modified Shultz with the disclosure of Takahashi, Hawkins and Herz (which it is not), the theoretical result would still fail to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 6-9, 19 and 21.

Accordingly, for at least all the above reasons, claims 6-9, 19 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 11, 12, 15 and 16 over Schultz in view of Takahashi, Hawkins and XML**

In the Office Action, claims 11, 12, 15 and 16 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, Hawkins, and further in view of the definition of XML in The American Heritage Dictionary, Fourth Edition ("XML"). The Applicants respectfully traverse the rejection.

Claims 11, 12, 15 and 16 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 11, 12, 15 and 16 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12, 15 and 16.

The Examiner relies on XML as a metalanguage written in SGML that allows one to design a markup language that facilitates the exchange of data (See Office Action, pages 13 and 14). Thus, nothing within the definition of and/or the use of XML discloses or suggests an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12, 15 and 16.

Thus, even if it were obvious to modified Shultz with the disclosure of Takahashi, Hawkins and the definition of XML (which it is not), the theoretical result would still fail to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12, 15 and 16.

Accordingly, for at least all the above reasons, claims 11, 12, 15 and 16 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 13 over Shultz in view of Takahashi, Hawkins, XML and McConnell**

In the Office Action, claim 13 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, Hawkins, XML and further in view of *An Experimental 4-Mb Flash EEPROM with Sector Erase* to McConnell ("McConnell"). The Applicants respectfully traverse the rejection.

Claim 13 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 13 recites an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi, Hawkins and XML fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 13.

McConnell is relied on to disclose memory that may be programmed 1 byte at a time and an experimental EEPROM flashing process on 4-Mbs density flash memories (Office Action, page 15). Thus, McConnell fails to disclose or suggest any details related to the retrieval and forwarding of information from a data source, much less an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 13.

Thus, Shultz modified by Takahashi, Hawkins, XML and McConnell would still fail to disclose, teach or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 13.

Accordingly, for at least all the above reasons, claim 13 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 17 over Schultz in view of Takahashi, Hawkins, Herz and Kantor**

In the Office Action, claim 17 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, Hawkins and Herz, and further in view of *Request for Comments: 977, Network Working Group* to Kantor ("Kantor"). The Applicants respectfully traverse the rejection.

Claim 17 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 17 recites an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads.

As discussed above, Shultz modified by the disclosure of Takahashi, Hawkins and Herz fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 17.

Kantor is relied on to disclose a Network News Transfer Protocol ("NNTP") to communicate with a news server to transfer articles between servers (See Office Action, page 16). Thus, Schultz modified by the disclosure of Takahashi, Hawkins, Herz and Kantor would as best, even if they were obvious to combine (which they are not), use NNTP to selectively retrieve data from at least one data source according to a user defined criteria, **NOT** an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 17.

Thus, Shultz modified by the disclosure of Takahashi, Hawkins, Herz and Kantor would still fail to disclose, teach or suggest an individualized network information delivery system **interposed between at least one data**



source and a destination device that implements user objects as individual threads, as recited by claim 17.

Accordingly, for at least all the above reasons, claim 17 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 18 over Schultz in view of Takahashi, Hawkins and Small**

In the Office Action, claim 18 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Hawkins, and further in view of *Request for Comments: 2739, Network Working Group* to Small ("Small"). The Applicants respectfully traverse the rejection.

Claim 18 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 18 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz modified by the disclosure of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claim 18.

Small is relied on to disclose additional data sources (See Office Action, page 17). Thus, Schultz modified by Takahashi, Hawkins and the disclosure of Small, even with the ability to search additional data sources, fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claim 18.

Accordingly, for at least all the above reasons, claim 18 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 20 over Schultz in view of Takahashi, Hawkins and Macera**

In the Office Action, claim 20 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Hawkins, and further in view of U.S. Patent No. 6,453,339 to Macera et al. ("Macera"). The Applicants respectfully traverse the rejection.

Claim 20 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 20 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz modified by the disclosure of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claim 20.

Macera is relied on to disclose a system and method to augment the searchable data sources (See Office Action, page 18). Macera discloses a system and method of converting and routing data packets within a data network (See Abstract), not disclosing or suggesting an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claim 20.

Therefore, even if it were obvious to modify Shultz with the disclosure of Takahashi, Hawkins and Macera to augment the searchable data sources (which it is not), Shultz modified by Takahashi, Hawkins and Macera would still fail to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claim 20.

Accordingly, for at least all the above reasons, claim 20 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 22 over Schultz in view of Takahashi, Hawkins and Reed**

In the Office Action, claim 22 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Hawkins, and further in view of U.S. Patent No. 6,088,717 to Reed et al. ("Reed"). The Applicants respectfully traverse the rejection.

Claim 22 recites an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 22.

Reed is relied on to disclose a communication system that allows a user to receive an e-mail notification from a database agent monitoring the database when a new entry or a certain condition has been made in that database at col. 6, lines 62-66 (See Office Action, page 19). Reed is further relied on to disclose that a data exchange event is initiated either manually by the consumer or automatically at col. 76, lines 8-9 (See Office Action, page 19).

Reed discloses information contained in a provider database that is transferred and used in communications relationships with different consumers (See col. 9, lines 2-4). The association information is used to selectively distribute information and information updates (See Reed, col. 9, lines 6-8). A distribution server collects information from a provider program and a consumer program (See Reed, Fig. 1).

Thus, Reed discloses selective distribution of information between a provider computer, a consumer computer and a distribution server. Reed fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 22.

Therefore, even if it were obvious to modify Shultz with the disclosure of Takahashi, Hawkins and Reed (which it is not), Shultz modified by

Takahashi, Hawkins and Reed would still fail to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claim 22.

Accordingly, for at least all the above reasons, claim 22 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 23-25 over Schultz in view of Takahashi, Hawkins, Reed and von-Bultzingloewen**

In the Office Action, claims 23-25 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, Hawkins and Reed, and further in view of Active Information Delivery in A COBRA-Based Distributed Information System to von-Bultzingloewen ("von-Bultzingloewen"). The Applicants respectfully traverse the rejection.

Claims 23-25 are dependent on claim 22, and are allowable for at least the same reasons as claim 22.

Claims 23-25 recite an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi, Hawkins and Reed fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claims 23-25.

The Office Action relies on von-Bultzingloewen to allegedly make up for the deficiencies in Schultz in view of Takahashi, Hawkins and Zirngibl. In particular, von-Bultzingloewen is relied on to disclose a process to monitor database value changes upon the detection of a change in three CLIPS rules, detecting a change in content, changed value and comparison of a new value to a limit value to determine if an action should proceed (See Office Action, page 20). Von-Bultzingloewen relies on a single set of criteria for reviewing

information for relevancy from a data source that is passed to user (See page 218, second column, lines 5-28).

Thus, von-Bultzingloewen fails to disclose or suggest a the use of threads for any purpose, much less an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claims 23-25.

Therefore, Schultz modified by Takahashi, Hawkins, Reed and von-Bultzingloewen would still fail to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claims 23-25.

Accordingly, for at least all the above reasons, claims 23-25 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 26, 30 and 31 over Shultz in view of Takahashi, Hawkins and Zirngibl**

In the Office Action, claim 26, 30 and 31 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Hawkins, and further in view of U.S. Patent No. 6,606,596 to Zirngibl et al. ("Zirngibl"). The Applicants respectfully traverse the rejection.

Claims 26, 30 and 31 recite a system and method relying on at least one of an event listener and a data worker **interposed between an information source and user** that are implemented as individual threads.

As discussed above, Shultz in view of Takahashi and Hawkins fails to disclose or suggest an entity **interposed between an information source and a destination, e.g., user** that are implemented as individual threads, much less a system and method that relies on at least one of an event listener and a data worker **interposed between an information source and an individual user** that are implemented as individual threads, as recited by claims 26, 30 and 31.

Zirngibl discloses a system and method of creating sound files for a destination device based on user criteria, e.g., a report of the result of a favorite sports team game (See Fig. 3a; col. 5, lines 55-65). Thus, Zirngibl's user specifies a set of criteria for locating and downloading a desired piece of information from a source storing the sound file. Zirngibl fails to disclose or suggest a system and method relying on at least one of an event listener and a data worker interposed between an information source and user that are implemented as individual threads, as recited by claims 26, 30 and 31.

Thus, Shultz modified by the disclosure of Takahashi, Hawkins and Zirngibl fails to disclose or suggest a system and method relying on at least one of an event listener and a data worker interposed between an information source and user that are implemented as individual threads, as recited by claims 26, 30 and 31.

Accordingly, for at least all the above reasons, claims 26, 30 and 31 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 27 and 32 over Shultz in view of Takahashi, Hawkins, Zirngibl and Daswani**

In the Office Action, claim 27 and 32 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, Hawkins and Zirngibl, and further in view of U.S. Patent No. 6,477,565 to Daswani et al. ("Daswani"). The Applicants respectfully traverse the rejection.

Claims 27 and 32 are dependent on claims 26 and 31 respectively, and are allowable for at least the same reasons as claims 26 and 31.

Claims 27 and 32 recite a system and method relying on at least one of an event listener and a data worker interposed between an information source and user that are implemented as individual threads.

As discussed above, Shultz in view of Takahashi, Hawkins and Zirngibl fails to disclose or suggest a system and method relying on at least one of an event listener and a data worker interposed between an information

source and user that are implemented as individual threads, as recited by claims 27 and 32.

The Office Action relies on Daswani to allegedly make up for the deficiencies in Shultz in view of Takahashi and Zirngibl to arrive at the claimed features. The Applicants respectfully disagree.

Daswani discloses a system and method for retrieving and disseminating information records from Internet sources that includes a client device and an intermediary server system (See Abstract). A request for data can include a data result of a site-specific search according to defined parameters, information about departure/arrival parameters and gate instructions, a desire to access only existing incoming mail from a certain individual or individuals (See Daswani, col. 7, lines 17-30).

Thus, Daswani discloses a system and method of allowing a user to selectively retrieve data from a data source according to a user defined criteria. However, Daswani fails to disclose or suggest the use of threads for any reason, much less a system and method relying on at least one of an event listener and a data worker interposed between an information source and user that are implemented as individual threads, as recited by claims 27 and 32.

Thus, even if it were obvious to modify Shultz in view of Takahashi, Hawkins, Zirngibl and Daswani (which it is not), the result would still fail to disclose or suggest a system and method relying on at least one of an event listener and a data worker interposed between an information source and user that are implemented as individual threads, as recited by claims 27 and 32.

Accordingly, for at least all the above reasons, claims 27 and 32 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 28, 29 and 33-38 over Shultz in view of Takahashi, Hawkins, Zirngibl and von-Bultzingloewen**

In the Office Action, claims 28, 29 and 33-38 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi,

Hawkins and Zirngibl, and further in view of von-Bultzingloewen. The Applicants respectfully traverse the rejection.

Claims 28, 29, 33-38 are dependent on claims 26, 31 and 31 respectively, and are allowable for at least the same reasons as claims 26 and 31.

Claims 28, 29 and 33-38 recite a system and method relying on at least one of an event listener and a data worker **interposed between an information source and user** that are implemented as individual threads.

As discussed above, Shultz in view of Takahashi, Hawkins and Zirngibl fails to disclose or suggest a system and method relying on at least one of an event listener and a data worker **interposed between an information source and user** that are implemented as individual threads, as recited by claims 28, 29 and 33-38.

As discussed above, von-Bultzingloewen fails to disclose or **suggest** the use of threads for any reason, much less a system and method relying on at least one of an event listener and a data worker **interposed between an information source and user** that are implemented as individual threads, as recited by claims 28, 29 and 33-38.

Thus, Shultz in view of Takahashi, Hawkins, Zirngibl and von-Bultzingloewen would still fail to disclose, teach or suggest a system and method relying on at least one of an event listener and a data worker **interposed between an information source and user** that are implemented as individual threads, as recited by claims 28, 29 and 33-38.

Accordingly, for at least all the above reasons, claims 28, 29 and 33-38 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.



**Claims 1-5, 22, 26, 30, 31 and 35-47 over Takahashi in view of Hawkins**

In the Office Action, claims 1-5, 22, 26, 30, 31 and 35-47 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Takahashi in view of Hawkins.

Claims 1-5, 22, 39 and 40 recite an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads. Claims 26, 30, 31 and 35-47 recite a system and method relying on an event listener and a data worker **interposed between a source and a destination** that are implemented as individual threads.

The Examiner acknowledges that Takahashi fails to disclose all of the claimed features. The Examiner relies on Hawkins to make up for the deficiencies in Takahashi to arrive at the claimed features. The Applicants respectfully disagree.

As discussed above, the Examiner alleges Hawkins discloses limiting one watermarking thread per processor at col. 4, lines 1-9 and lines 39-45 (See Office Action, page 5). Moreover, the Examiner alleges that Hawkins discloses an information retrieval system acting on behalf of a user request that implements requests in threads and executes each thread individually (See Office Action, page 5).

The Examiner appears to be correct in that Hawkins discloses a system and method wherein one watermarking thread is implemented per processor at col. 4, lines 1-9 and lines 39-45. However, Hawkins discloses watermark objects as individual threads (having nothing to do with a user) **NOT user objects** that are implemented as individual threads, and an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 1-5, 22, 26, 30, 31 and 35-47.

Moreover, Hawkins discloses a watermarking process that is implemented on a server at col. 6, lines 44-59. Hawkins' server is a data source, **NOT** an individualized network information delivery system **interposed between at least one data source and a destination device** and at least one of an event

listener and a data worker **interposed between** a source and a destination that are implemented as individual threads, as recited by claims 1-5, 22, 26, 30, 31 and 35-47.

Thus, modifying Shultz in view of Takahashi with the disclosure of Hawkins would at best result in a server processing watermarks, each watermark being processed as individual threads. Shultz in view of Takahashi and Hawkins fails to disclose or suggest an individualized network information delivery system **interposed between** at least one data source and a destination device that implements user objects as individual threads and at least one of an event listener and a data worker **interposed between** a source and a destination that are implemented as individual threads, as recited by claims 1-5, 22, 26, 30, 31 and 35-47.

Accordingly, for at least all the above reasons, claims 1-5, 22, 26, 30, 31 and 35-47 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 6-10, 19 and 21 over Takahashi in view of Hawkins and Herz**

In the Office Action, claims 6-10, 19 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Takahashi in view of Hawkins, and further in view of Herz. The Applicants respectfully traverse the rejection.

Claims 6-10, 19 and 21 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 6-10, 19 and 21 recite an individualized network information delivery system **interposed between** at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Takahashi in view of Hawkins fails to disclose or suggest an individualized network information delivery system **interposed between** at least one data source and a destination device that implements user objects as individual threads, as recited by claims 6-10, 19 and 21.

As discussed above, Herz discloses a system for and method of allowing a user to define criteria that is used to selectively retrieve content from a

data source. However, Herz's system and method relies on a direct connection of clients and servers **NOT** an individualized network information delivery system **interposed between at least one data source and a destination device**, much less that implements user objects as individual threads, as recited by claims 6-10, 19 and 21.

Thus, even if it were obvious to modified Takahashi with the disclosure of Hawkins and Herz (which it is not), the theoretical result would still fail to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claims 6-10, 19 and 21.

Accordingly, for at least all the above reasons, claims 6-10, 19 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 11, 12, 15 and 16 over Takahashi, Hawkins and XML**

In the Office Action, claims 11, 12, 15 and 16 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Takahashi in view of Hawkins, and further in view of the definition of XML in The American Heritage Dictionary, Fourth Edition ("XML"). The Applicants respectfully traverse the rejection.

Claims 11, 12, 15 and 16 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 11, 12, 15 and 16 recite an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads.

As discussed above, Takahashi in view of Hawkins fails to disclose or suggest an individualized network information delivery system **interposed between at least one data source and a destination device** that implements user objects as individual threads, as recited by claims 11, 12, 15 and 16.

The Examiner relies on XML as a metalanguage written in SGML that allows one to design a markup language that facilitates the exchange of data

(See Office Action, page 33). Thus, nothing within the definition of and/or the use of XML discloses or suggests an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12, 15 and 16.

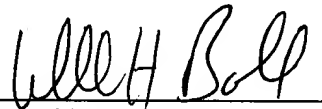
Thus, even if it were obvious to modified Takahashi with the disclosure of Hawkins and the definition of XML (which it is not), the theoretical result would still fail to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12, 15 and 16.

Accordingly, for at least all the above reasons, claims 11, 12, 15 and 16 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

### **Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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